REMARKS

Applicant thanks Examiner Greene for his careful attention to this application and respectfully requests reconsideration of the application identified above. Claims 1-29; 38-45 and 51-54 are cancelled. Claims 30 and 46-48 have been amended.

I.   Claim map

Claim 30: Independent claim
    Claim 58 (new): depends on claim 30
        Claim 55: depends on claim 58
            Claim 56: depends on claim 55
                Claim 57: depends on claim 56
    Claim 31: depends on claim 30
        Claim 33: depends on claim 31
        Claim 34-37: depends from immediately preceding claim.

Claim 46:   Independent claim
    Claims 47-48: Depend from immediately preceding claim

Claim 59:   New independent claim

II.   General

A web site is composed of web pages. The web pages are stored files on a server. This comports with the common definition of web pages and web sites.

Thus, there is a difference between changing a web page and changing a web site. The only change that can be done to a web page is to modify the programming code of the web page. However, a web site can be changed by deleting web pages, adding web pages, or modifying the content of one or more web pages.

Additionally, a web page is an HTML document. A web page is not a binary file, such as an

image file, audio file or video file.

III.   Art cited by the Examiner

A.   Davis

The system shown in Davis limits the types of modifications to a web page to only changing

the content of a single web page or adding a binary file to the web site.

The Davis patent specifically says:

> "It is another object of the present invention to update and/or change the content
> within a Web page without granting access to delete, copy, move or rename files and
> directories on the server hosting the Web page. " Col. 2, lines 44-47.

Davis further says:

> "The present invention is also advantageous from a server security standpoint in that
> only pre-determined Web page files on a server can be written to, and only after
> proper authentication. In addition, other files on a server cannot be read, **nor can any
> files** be deleted, copied, moved, or renamed. The present invention can be configured
> to prevent the ability to upload executable files, thus reducing the risk of rogue
> programs and viruses infecting a server." Col. 3, line 65 – col. 4, line 5. (emphasis
> added).

Thus, content can only be changed within the web page. The system cannot delete pages

from the web site. The Davis system allows only modifications to a web page. It does not allow

general management of the web site.

B.   Lindholm

Lindholm is a computer program and system for changing a web page. Unlike Davis,

Lindholm is designed to run on a workstation. A web page is downloaded to the work station from

the server. After the web page is modified, the web page is uploaded back to the server. There is

no mention of adding or deleting web pages.

Programs like Lindholm were referred to in the Davis patent. However, it is clear that the

one advantage of the system shown in Davis is that a program such as the one shown in Lindholm

would not be used. Col. 2, lines 11-25.

IV.   The Claims

Claim 30 as amended requires parsing an email, determining a request type indicative of a

change to the web site, the change to the web site being one of deleting a web page.

The Examiner rejected Claim 30 due to Davis in view of Lindhorst.

The MPEP 2143.01(V) states:

"If proposed modification would render the prior art invention being modified unsatisfactory
for its intended purpose, then there is no suggestion or motivation to make the proposed
modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)"

As pointed out, the expressly stated purpose of the device show in Davis is to limit the

extent to which a person responsible for content on a web site can make modifications to the web

site. Specifically, a person can only modify the content of a single web page. A person cannot

delete web pages or add web pages.

Thus, to allow other modifications to the web site is against the intended purpose of the

system shown in Davis. Any additional functionality to the system shown in Davis to allow a user

to make other changes to the web site is specifically disavowed by Davis. Thus, Davis should not

be combined with any reference to extend its capability to add or delete web pages.

Lindhorst is a stand alone program for creating and modifying web pages. The system shown Davis is totally different approach. Davis uses emails sent to the server to change web pages. Thus, a person skilled in the art would not combine the two.

Further, Davis specifically states that programs such as the one shown in Lindhorst are problematic due to their complexity and time limitations. Col. 2, lines 11-25. Thus, Davis teaches away from using a program such as Lindhorst. Therefore, there is no suggestion to combine Davis with Lindhorst.

Even if Davis were combined with Lindhorst, the claimed system would not result. Lindhorst does not show determining a "request type" indicative of a modification to the web site. The system shown in Lindhorst is only for making changes within a web page. It does not allow deletion web pages.

Further, the claim requires, among other things, that "*if the request type is for a change to web pages*, creating a programming code segment from the email".

However, there is no "request type" in Davis. Every email sent in the system shown in Davis is processed in a specific manner.

Fig. 10 shows the method for interpreting the email. The email first does the modification to the web page. The email is then search to see if a binary file is attached. If so, then attached binary file is added to the web site. See Fig. 10, boxes 310 & 312. Thus, the system never determines a "request type" from the email. No where does the algorithm show that a :"request type" is determined.

Claim 58 is dependent upon claim 30. It adds that the request type could also be one of adding an additional web page to the web site.

Claim 55, dependent upon claim 58, states that programming code is created from the variable list. Claim 56 states that the first web page may be deleted. Claim 57 says that the additional web page is created.

Claim 57 is similar to claim 56.

Claim 31-37 are allowable as they depend from allowable claims.

Claims 46-50 are for a computer readable medium containing programming code units. Claim 46 requires, among other things, a third program code unit for determining from the email a request type, the request type being one of deleting a first web page. As stated above, Davis does not allow deletion of web pages.

Claim 47 requires a fourth program code unit for determining from the variable list a web page variable, the web page variable identifying the first web page.

Claim 48 says that a program code unit determine from the variable list a count of changes to the web site. This is also not shown in Davis. The process shown in Fig. 10 of Davis outlines shown that the system never does a "count" of changes to a web page. The Davis system continues processing until it no longer has tasks to perform. Further, there is no need in Davis to determine a count. The claimed system obtains a count.

Claims 49 and 50 are also allowable.

Claim 59 is new. It is a method of operating a software program. One step is the parsing of a first web page is to create a database of a plurality of objects, each of the plurality of objects

associated with a unique HTML tag in the web page. After the email is received, the program uses

the database to identify a first HTML tag in the web page associated with the first object and then

modifies the first HTML tag. The system shown in Davis does not use a database.   Thus, new
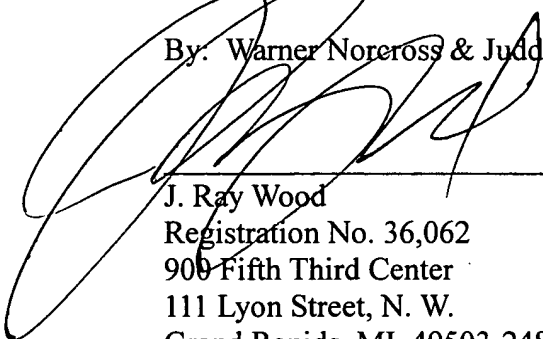
claim 59 is allowable.

CONCLUSION

In view of the above amendments and these remarks, Applicants respectfully submit

that the present application is in condition for allowance. A notice to that effect is earnestly and

respectfully requested.

Respectfully submitted,

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